

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:  
JOE ARTHUR POWELL JR  
2026 ABINGDON DRIVE  
LAVERGNE TN 37086  
SSN: XXX-XX-7144

Debtor(s).

) CHAPTER 13  
) CASE NO: 315-09010  
) JUDGE: CHARLES M. WALKER  
)  
)  
)  
) Response Date: 6/4/2019

Hearing Date: 6/12/2019 at 8:30 am, Court  
Room 1, 2<sup>nd</sup> Floor Customs House,  
701 Broadway, Nashville, TN 37203

**DEBTOR'S OBJECTION TO TRUSTEE'S MOTION TO DISMISS FOR CAUSE  
FOR FAILURE OF DEBTOR TO FULLY DISCLOSE LIABILITIES**

Come(s) the Debtor(s), Joe Arthur Powell Jr, through his attorney of record, J. M. GEORGE & ASSOCIATES, and requests the Court to deny the Trustee's Motion to Dismiss For Cause For Failure of Debtor to Fully Disclose Liabilities as to Claim #12 filed by State of Tennessee, DHS Child Support in the amount of \$10,358.

As a basis for the Debtor's objection, Debtor states upon filing his Chapter 13 Bankruptcy case on 12/15/2015, he had no knowledge of owing any back child support. Furthermore, the Debtor has filed a Motion to Disallow Claim # 12 filed by State of Tennessee, DHS Child Support in the amount of \$10,358.

WHEREFORE, based upon the foregoing premises, Debtor(s) prays the Court will grant an Order denying the Trustee's Motion to Dismiss For Cause For Failure of Debtor to Fully Disclose Liabilities.

Respectfully submitted,  
J. M. GEORGE & ASSOCIATES

/s/ JAMES M. GEORGE

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certifies that on the June 2, 2019 a true and correct copy of the foregoing has been served in the following manner: Email by Electronic Case Noticing to: US Trustee. and to the Chapter 13 Trustee. A copy of same was mailed first class, postage prepaid to the Debtor.

JAMES M. GEORGE  
JAMES M. GEORGE

Mailings: 1